

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

§ Civil Action No. 4:20-cv-00576
§
§ CLASS ACTION
§
The Honorable Charles R. Eskridge III

**AFFIDAVIT OF ROBERT MERRILL IN SUPPORT OF PLAINTIFFS' MOTION
TO EXCLUDE CERTAIN TESTIMONY BY DEFENDANTS' PROPOSED
EXPERT DR. ROCCO DETOMO**

I, ROBERT MERRILL, declare as follows:

1. I am a geologist and submitted an expert report in the above captioned-case.
2. My first exposure to Peter Rose's risk and resource analysis techniques was in the late 1980's. I consulted as part of a consortium on the development of the MMRA from about 1993 – 1999. I took my first course with Rose & Associates in 2000 where I was introduced to the early version of the MMRA and continued to use it in my exploration endeavors.
3. To my knowledge, Rose & Associates has always taught courses, many of them in-house at oil and gas companies, some open.
4. Roger Holeywell and David Cook were the two Rose & Associates personnel integral to developing the MMRA.
5. I reviewed the transcript of Dr. Detomo's deposition in this matter, and saw he referenced geophysicists Mike Forrest and Rocky Roden, whom I know personally.
6. Mike Forrest and Rocky Roden did not write the MMRA, but were involved in the DHI Consortium and Seismic Amplitude Analysis Module. My understanding is that the DHI Consortium was figuring out ways to incorporate geophysical insights from numerous companies into the MMRA at the time that Dr. Detomo participated.
7. The DHI Consortium remains in existence today and continues to hold meetings.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
March 16, 2023, at Sugar Land, Texas.



ROBERT MERRILL

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on all counsel of record who have appeared in this matter via the Court's CM/ECF system on this, the 16th day of March, 2023.

s/ Joe Kendall

JOE KENDALL